

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,)
)
)
v.) **No. 08-CR-181**
)
)
MARIO S. LEVIS,)
a/k/a "Sammy Levis,")
)
_____)

DEFENDANT'S SUPPLEMENTAL PROPOSED
VOIR DIRE QUESTIONS

Defendant, Mario S. Levis, through counsel, respectfully submits the following supplemental proposed *voir dire* questions, which we request the Court pose to prospective jurors:

1. Please tell us whether you, any family member, or close friend has ever been employed in any of the following occupations:
 - a. Advertising / Marketing
 - b. Public Relations
 - c. Accountant
 - d. Bookkeeper
 - e. Auditor
 - f. Comptroller
 - g. Compliance Officer

h. Quality Control Manager

i. Human Resource Director

j. Customer Service Representative

2. The defendant in this case, Mr. Levis, has been accused of making materially false or misleading statements about the value of certain assets that his former employer, Doral Bank, owned. Do you feel that you might have a difficult time remaining fair and impartial to Mr. Levis because of the nature of the accusations against him?

3. Do you feel that executives of public companies often make false or misleading statements to stock market analysts and the investing public about the financial condition of their companies?

4. Do you feel that you might have a difficult time remaining fair and impartial to Mr. Levis because he was responsible for making statements to the investing public about the financial condition of a public lender, and / or because he was an executive of a mortgage lender?

5. Tell us about whether you, a family member, or close friend has ever been employed by a publicly traded mortgage lender or bank? If so, in what capacity?

6. Tell us about your experience with internet-based brokerage companies such as E-trade, Scottrade, Ameritrade, etc.?

7. Tell us about any negative experiences you may have had with a bank or mortgage lender? Do you feel that because of those negative experiences you might have a difficult time being fair and impartial to Mr. Levis because he was employed by a bank / mortgage lender during the events at issue in this case?

8. Tell us about any difficulties you, a family member, or a friend have had paying rent or making mortgage payments in the past several years? If you wish, we can discuss your response at sidebar and outside the presence of the rest of the panel.

9. How do you feel about the current mortgage crisis. Do you feel so strongly that the current mortgage crisis was caused by mortgage lenders that you might have a difficult time remaining fair and impartial to Mr. Levis in this case because he was a senior executive for a mortgage lender?

10. Tell us about any experiences you or someone close to you has had living or working in Puerto Rico or in any Latin American country?

11. Do you feel that because Mr. Levis has been charged with more than one count, that he must have done something wrong?

12. Tell us about whether you, a family member, or close friend, has ever been employed at a bank, or applied for employment at a bank in the past? If so, in what capacity?

Respectfully submitted,

/s Roy Black

ROY BLACK, ESQ.

(FL Bar No. 126088)

HOWARD M. SREBNICK, ESQ.

(FL Bar No. 919063)

MARIA D. NEYRA, ESQ.

(FL Bar No. 074233)

Black, Srebnick, Kornspan & Stumpf, P.A.

201 South Biscayne Blvd., Suite 1300

Miami, Florida 33131

Tele: (305) 371-6421

Rblack@RoyBlack.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 29, 2010, I electronically filed the foregoing document through CM/ECF, which will then transmit a copy of the document to:

William Stellmach, AUSA

U.S. Attorney's Office

Southern District of New York

1 St. Andrews Plaza

New York, NY 10007

William.stellmach@usdoj.gov

/s Roy Black

ROY BLACK, ESQ.